

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
3 charlesverhoeven@quinnemanuel.com
4 David A. Perlson (Bar No. 209502)
5 davidperlson@quinnemanuel.com
6 Melissa Baily (Bar No. 237649)
7 melissabaily@quinnemanuel.com
8 John Neukom (Bar No. 275887)
9 johnneukom@quinnemanuel.com
10 Jordan Jaffe (Bar No. 254886)
11 jordanjaffe@quinnemanuel.com
12 50 California Street, 22nd Floor
13 San Francisco, California 94111-4788
14 Telephone: (415) 875-6600
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION FOR RELIEF FROM NON-
DISPOSITIVE PRETRIAL ORDER OF
MAGISTRATE JUDGE**

23 vs.

24 UBER TECHNOLOGIES, INC.;
25 OTTOMOTTO LLC; OTTO TRUCKING
26 LLC,

27 Defendants.

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1 Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests
 2 to file under seal portions of its June 29 Motion for Relief from Non-Dispositive Pretrial Order of the
 3 Magistrate Judge (the “Objections”), filed concurrently herewith. Specifically, Waymo requests an
 4 order granting leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Objections	Highlighted in Blue	Defendants

7 **I. LEGAL STANDARD**

8 Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or
 9 portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under
 10 the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored
 11 to seek sealing only of sealable material.” *Id.*

12 **II. DEFENDANTS’ CONFIDENTIAL INFORMATION**

13 Waymo seeks to seal the portions of the Objections only because Defendants have designated
 14 the information confidential. Declaration of Patrick Schmidt (“Schmidt Decl.”) ¶ 3. Waymo does not
 15 oppose the merits of sealing Defendants’ designated material, and expects Defendants to file one or
 16 more declarations in accordance with the Local Rules.

17 **III. CONCLUSION**

18 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the
 19 above listed documents accompany this Administrative Motion. For the foregoing reasons,
 20 Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

22 DATED: June 29, 2017

23 QUINN EMANUEL URQUHART & SULLIVAN,
 24 LLP

25 By /s/ Charles K. Verhoeven

26 Charles K. Verhoeven
 27 Attorneys for WAYMO LLC